

1 DISTRICT JUDGE RICHARD A. JONES
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12 UNITED STATES DISTRICT COURT
13 WESTERN DISTRICT OF WASHINGTON
14 AT SEATTLE
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1617 UNITED STATES OF AMERICA,) No. CR 11-070-RAJ
18 Plaintiff,)
19 v.) DEFENDANT'S EXHIBIT LIST FOR
20 ROMAN SELEZNEV,) EVIDENTIARY HEARING ON
21 Defendant.) DEFENSE MOTION TO DISMISS
22) INDICTMENT
23
2425 Defendant Roman Seleznev, through undersigned attorneys, submits the
26 following list of exhibits that he may use at his Evidentiary Hearing, scheduled for
May 13th and May 14th, 2015.

Exhibit	Description	Bates No.
101	United States Department of Justice press release, "Russian Hacker Arrested for Computer Hacking Scheme that Victimized Thousands of Credit Card Customers," July 7, 2014.	
102	U.S. Department of Homeland Security/U.S. Secret Service Press Release, July 7, 2014.	
103	Russian Foreign Ministry reaction: "Foreign Ministry outraged by Russian citizen's detention by US secret service in Maldives," Tass Russian News Agency, July 8, 2014; "Comment by the	

Exhibit	Description	Bates No.
	Information and Press Department of the Russian Ministry of Foreign Affairs regarding the situation involving the kidnapping of the Russian national Roman Seleznyov by US intelligence agencies,” July 11, 2014; and “Russia Demands United States Release Accused Hacker Roman Selevnez Immediately,” Reuters, July 15, 2014.	
104	Declaration of Roman Seleznev (the “Seleznev Decl.”)	
105	March 13, 2013 U.S. Secret Service Investigative Report	USSS_PHOENIX 00029-31
106	<i>United States v. Seleznev</i> , No. 14-00056 (D. Guam), Dkt. No. 47, Transcript of Proceedings on July 31, 2014 (the “Guam Transcript”)	
107	July 3, 2014 Diplomatic Note from the Embassy of the United States of America, Colombo, to the Ministry of Foreign Affairs of the Republic of Maldives	
108	Emails between U.S. officials or agents, and Maldivian authorities, July 3 through 14, 2014	
109	July 8, 2014 U.S. Secret Service Investigative Report.	USSS 000243-246
110	LinkedIn page for Hussain Usham, “Police corporal” with the “Maldives Police Service”	
111	July 24, 2014 Declaration of Sharafulla Shihab (the “Shihab Decl.”)	

Exhibit	Description	Bates No.
112	Photographs of Roman Seleznev, produced by the United States on November 7, 2014 and December 15, 2014	Seleznev_Arrest_0008, 9 and 16
113	August 7, 2014 Decision and Order re: Motion to Discharge and Release Defendant Pursuant to Fed. R. Crim. P. 12(b)(3)(A), Guam Proceeding, Dkt. No. 44 (“Guam Decision and Order”)	
114	U.S. Attorneys’ Manual, Chapter 9-15	
115	Constitution of the Republic of the Maldives (2008) (English translation), Articles 45-48, 50.	
116	U.S. Attorneys’ Criminal Resources Manual, § 611	
117	“Member Countries,” http://www.interpol.int/Member-countries/World (last accessed April 2, 2015)	
118	“Notices,” http://www.interpol.int/INTERPOL-expertise/Notices (last accessed April 2, 2015)	
119	July 5, 2014 Interpol Red Notice	Guam_Rule5_Produced_000043-47
120	July 17, 1999 Treaty between the United States of America and the Russian Federation on Mutual Legal Assistance in Criminal Matters, Preamble (the “MLAT”)	
121	September 15, 2010 U.S. Secret Service Investigative Report	USSS_CINCINATI_00011-14

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26	Exhibit	Description	Bates No.
	122	May 10, 2011 Secret Service Investigative Report	USSS_CINCINAT TI 00069-72 FILED UNDER SEAL
	123	United Nations International Covenant on Civil and Political Rights (the “ICCPR”), including Articles 9 and 13	

DATED this 12th day of May, 2015.

Respectfully submitted,

s/ Russell V. Leonard
Assistant Federal Public Defender

s/ Dennis Carroll
Assistant Federal Public Defender

Attorneys for Roman Seleznev

CERTIFICATE OF SERVICE

I certify that on May 12, 2015, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of filing to all registered parties.

/s/ Barbara Hughes
Paralegal